

JUN 26 2019

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDOIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FELIPE PENUELAS-RODRIGUEZ,
REYNA TREJO,

Defendants.

) INDICTMENT
3:19 CR 399

) JUDGE CARR

) CASE NO. MAG. JUDGE KNEPP) Title 21, United States Code,
) Sections 841(a)(1) and (b)(1)(A)
) and 846; Title 18, United States
) Code, Section 2COUNT 1

(Conspiracy to Possess with Intent to Distribute a Controlled Substance, 21 U.S.C. § 846)

The Grand Jury charges:

1. On or about June 6, 2019, in the Northern District of Ohio, Western Division, Defendants FELIPE PENUELAS-RODRIGUEZ and REYNA TREJO did knowingly, and intentionally combine, conspire, confederate, and agree with diverse others, to possess with the intent to distribute at least 400 grams or more of a mixture or substance containing a detectable amount of Fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and 846.

COUNT 2

(Possession with Intent to Distribute a Controlled Substance, 21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 18 U.S.C. § 2)

The Grand Jury further charges:

2. On or about June 6, 2019, in the Northern District of Ohio, Western Division, Defendants FELIPE PENUELAS-RODRIGUEZ and REYNA TREJO did knowingly and intentionally possess with intent to distribute at least 400 grams or more of a mixture or

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substance containing a detectable amount of Fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

FORFEITURE

The Grand Jury further charges:

3. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegation in Counts 1 and 2 are incorporated herein by reference. As a result of the foregoing offenses, Defendant FELIPE PENUELAS-RODRIGUEZ shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violation; and any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation; including, but not limited to \$1,303.00 in U.S. Currency seized on June 6, 2019.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.